

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

<div>In re: BYJU's ALPHA, INC.,¹ Debtor.</div>	<div>Chapter 11 Case No. 24-10140 (JTD)</div>
<div>BYJU'S ALPHA, INC., Plaintiff, v. CAMSHAFT CAPITAL FUND, LP, CAMSHAFT CAPITAL ADVISORS, LLC, CAMSHAFT CAPITAL MANAGEMENT, LLC, RIJU RAVINDRAN, INSPILEARN LLC, and THINK AND LEARN PRIVATE LIMITED, Defendants.</div>	<div>Adv. Pro. Case No. 24-50013 (JTD) <u>Related Adv. D.I.: 186, 242</u></div>

DECLARATION OF WILLIAM C. MORTON

William Cameron Morton, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am the founder and CEO of Defendant Camshaft Capital Advisors, LLC (“Camshaft Advisors”). Camshaft Advisors is the sole investment manager of Defendant Camshaft Capital Fund, LP (“Camshaft Fund”) and Defendant Camshaft Management, LLC (“Camshaft Management”) is the sole general partner of Camshaft Fund. I am the only member of the Camshaft Management limited liability company. I will refer to Camshaft Advisors, Camshaft Fund and Camshaft Management collectively as the “Camshaft Defendants.”

¹ The Debtor in this Chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, is: BYJU’s Alpha, Inc. (4260). The location of the Debtor’s service address for purposes of this Chapter 11 case is: 1007 N. Market St. Ste. G20 452, Wilmington, Delaware 19801.

2. I submit this declaration in further opposition to the motion by Plaintiff BYJU's Alpha, Inc. ("Plaintiff") and Intervenor-Plaintiff GLAS Trust Company LLC ("GLAS") for sanctions in the form of a default judgment and attorneys' fees and costs.

3. On June 5, 2024, I participated in a Zoom call with my counsel and counsel for the other parties in the above proceeding regarding discovery issues. During that call, counsel for Plaintiff and GLAS asked questions about documentation for the February 1, 2024 transfer other than the transfer agreement (which has been produced), such as any subscription agreement.

4. I do not know if such documents were in fact executed and I am not aware that other said documents are necessary for the February 1, 2024 transfer. If they were executed, they are not in the Camshaft Defendants' possession, custody or control.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed and executed June 10, 2024 in Dubai, United Arab Emirates.

Dated: June 10, 2024
Dubai, United Arab Emirates

DocuSigned by:
William Morton
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William C. Morton